PORZIO, BROMBERG & NEWMAN
A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW
163 MADISON AVENUE
MORRISTOWN, NJ 07960-1997
201-538-4006

TELECOPIER 201-538-5146
TELEX 130-509 (TPBN-LAW-UD)

PORZIO, BROMBERG, NEWMAN & BAUMEISTER
ONE EXCHANGE PLAZA
NEW YORK, NY 10006-3008
212-363-1200
TELECOPIER 212-363-1346

MICHEL F. BAUMEISTER
ROBERT J. BRENNAN
MYRON J. BROMBERG
THOMAS R. CHESSON
ROY ALAN COHEN
LAUREN E. HANDLER
EDWARD A. HOGAN*
ANITA HOTCHKISS
JOHN M. NEWMAN

MOIRA L. BROPHY*
D. JEFFREY CAMPBELL
ALEXANDER J. DRAGO
CHARLES E. ERWAY III
GEORGE J. GROCHALA*

JANE M. HANSON
JEAN SIH LIDON*
MARK W. LYNCH*
KENNETH R. MEYER*
LISA MURTHA
BETH D. POLLACK
RANDI POMERANTZ
ELLEN RELKIN
ELLEN LEWIS RICE*
TODD J. WEISS

RALPH PORZIO
OF COUNSEL

*N. J. BAR ONLY
N. J. & N.Y. BARS

June 19, 1987

Mr. Mike Nalbone
Industrial Site Evaluation Element
New Jersey Department of
Environmental Protection
401 East State Street, 5th Floor
Trenton, New Jersey 08608

Re: Hexcel Corporation, Lodi, New Jersey
ECRA Case No. 86009

Dear Mike:

Enclosed are three letters and attachments from Hexcel's consultant, Environ Corporation. Please note that the first letter requests your response on Monday, June 22, 1987. As indicated, please call Rob Powell at Environ.

Very truly yours,

Edward A. Hogan

EAH/mlp
Enclosures

cc: Mr. William Nosil
Mr. Gary Straub

ENVIRON Corporation
Counsel in Health and Environmental Science

June 18, 1987

Mr. Mike Nalbone
Bureau of Industrial Site Evaluation
New Jersey Department of
Environmental Protection
401 E. State Street, 5th Floor
Trenton, NJ 08608

Re: ECRA Case No. 86009 Hexcel Corporation,
Lodi, New Jersey

Dear Mr. Nalbone:

This letter is to document our meeting on May 20, 1987 during which we discussed the results of recent environmental sampling at the Fine Organic Corporation property in Lodi, New Jersey. On April 14, 1987 ENVIRON collected various environmental samples from the subject property for chemical analysis. These samples included floating oil in the industrial sewer system, sediments from the industrial sewer system, oil from various locations within the boiler room and pit in building no. 1, floor scraping and wood chip samples from within the boiler room, and water from manhole M8. The purpose of this sampling was to further define the extent and nature of oil and PCB contamination on the subject property.

The chemical analyses of these environmental samples, which were discussed with you during our meeting on May 20, 1987, indicate that PCBs are present within the industrial sewer system on the subject property. PCBs were also identified in oil samples from the pit within building no. 1 and in the oil, floor scrapping, and wood chip samples collected within the boiler room. A detailed description of these samples results will be provided to you in a separate addendum to our prior sampling plan, along with the laboratory reports for these chemical analyses.

At present the source of the PCB-contaminated oil is unknown. We are continuing to investigate the potential sources pending your further review of our ECRA sampling plan. In the interim, we propose to immediately take certain steps to restrict access to those areas which have been identified as being contaminated and to mitigate any further release of these materials into the environment. These steps are as follows:

1. A plywood covering will be placed over oil stained areas within the boiler room, and an enclosure will be constructed around

The Flour Mill, 1000 Potomac St., N.W.
Washington, D.C. 20007 • (202) 337-7444

the hot oil heating system which remains in the boiler room. Warning signs will be posted within the boiler room, identifying the PCB hazard and restricting access.

2. Additional sediment samples will be collected from the industrial sewer system downstream of the property. These samples will include sludge or sediment from a manhole on the property of Napp Chemical Co. (immediately south of Molnar Road), sediment samples from the wastewater pumping station approximately one block south of the FOC facility, and sediment samples from the stream bed of Saddle Brook at the point of outfall of the storm drain system which traverses the rear of the FOC property. These samples will be submitted to an environmental laboratory for analysis of TPHC and PCBs.

3. Access to the pit within building no. 1 will be restricted by placing of chain barriers and posting of warning signs.

4. An immediate search for a PCB response contractor will commence. This contractor will be retained to implement a program for effective removal of oil and any other PCB-contaminated materials on the property.

5. The borough of Lodi will be contacted to discuss the current interconnection of the storm drain and industrial sewer on the property. It is our recommendation that a temporary plug be installed in the industrial sewer to prevent the flow of wastewater into the storm drain system which appears to occur under surcharging conditions in the sewer.

6. The hot oil system which is located in the boiler room will be decontaminated.

7. A sampling plan addendum will be prepared to further evaluate the nature of PCB contamination in and around the boiler room. This plan will address our proposal for construction of additional borings and collection and analysis of additional environmental samples in this area.

Since our meeting on May 20, 1987 progress has been made on many of the above items. A plywood floor covering and enclosure has been constructed within the boiler room to restrict access to areas which have been identified as being contaminated with PCBs. Sediment samples were collected from the industrial sewer system, the pump station and Saddle Brook on June 15, 1987. These samples were submitted to an environmental laboratory for analysis of TPHC and PCBs. Warning signs have been posted on those areas which are known to be contaminated to restrict access. We have identified three

potential PCB response contractors for use at the facility. A meeting with these contractors will be held during the week of June 25, 1987. It is expected that a contractor will be retained within a few weeks thereafter. This contractor will then begin the development of a plan for interim cleanup and appropriate response at the site. A sample plan addendum has been prepared and is being submitted to you under separate cover.

As we explained during our meeting on May 20, 1987 we are proceeding with the above action items to address the identified contamination pending your further review of the ECRA sampling plan, which we have previously submitted. It is our understanding from discussions at that meeting that you are in general agreement with our proceeding on these action items in the interim. We will keep you advised of progress in this regard and of any further findings as a result of these proposed work items. If you have any questions or further comments or inputs regarding our immediate plans as we have outlined herein, please call.

Very truly yours,

Robert L. Powell

Robert L. Powell, Ph.D., P.E.
Project Manager

RLP:slh
1660H

cc: William Nosil, HEXCEL
Gary Straub, FOC
Ed Hogan, Esq.

ENVIRON Corporation
Counsel in Health and Environmental Science

June 18, 1987

Mr. Mike Nalbone
Bureau of Industrial Site Evaluations
New Jersey Department of
Environmental Protections
401 E. State Street, 5th Floor
Trenton, NJ 08608

Re: ECRA Case No. 86009 Hexcel Corporation,
Lodi, New Jersey

Dear Mr. Nalbone:

During our meeting of March 20, 1987 we discussed our plans to further investigate the source of PCB-contaminated oil at the Fine Organics Corporation facility in Lodi, New Jersey. As we explained, to date the source of this oil is unknown. We are proposing these additional investigations in an attempt to implement an effective program to mitigate any release of these materials into the environment.

The details of our proposed further investigations of this problem are outlined in an addendum to our environmental sampling plan which is being submitted to you under separate cover. This addendum includes the construction of additional borings in and around the boiler room on the subject property. These borings will be used to collect soil samples from the strata beneath the boiler room for chemical analysis. The general scope of these investigations were discussed with you during our meeting of May 20, 1987.
It is currently planned to commence construction of soil borings beneath the boiler room on June 24, 1987. These borings will be constructed using a driven casing technique, which will effectively seal any strata and prevent vertical migration of contamination along the borehole. All borings will be advanced to the depth of the pit within building no. 1 which is anticipated to be approximately 15 feet below grade, or until an area of oil contamination is discovered. These borings after completion will be abandoned by pumping full with a cement grout in accordance with the requirements of the NJDEP. One or more of these borings may be completed as a piezometer with a 1 1/2 inch PVC well screen and casing to monitor the thickness of any oil layer that is encountered. This manner of completion of the borings was requested by Mr. Jeff Fehr and is discussed in more detail in our Sampling Plan Addendum. We anticipate that this work be completed by June 25, 1987.

The Flour Mill, 1000 Potomac St., N.W.
Washington, D.C. 20007 • (202) 337-7444

During our meeting on May 20, 1987 you indicated that the NJDEP may desire to have a staff geologist present during the construction of these borings. I attempted to contact you by telephone on June 17, 1987 to notify you of our plans, but was told you would not return until June 22, 1987. Therefore I contacted Mr. Jeff Fehr in your absence and discussed this matter. I understand that Mr. Fehr may be present on June 24, 1987 to observe this work. Please confirm with me if Mr. Fehr or another representative of the NJDEP will be in attendance during this work. If you have any questions or wish to discuss the matter further before we proceed, please call me by Monday, June 22, 1987.

Very truly yours,

Robert L. Powell, Ph.D., P.E.
Project Manager

RLP:slh
1661H

cc: William Nosil, Hexcel
Gary Straub, FOC
Ed Hogan, Esq.

ENVIRON Corporation
Counsel in Health and Environmental Science

June 18, 1987

Mr. Mike Nalbone
New Jersey Department of
Environmental Regulations
Bureau of Industrial Site Evaluations
401 E. State Street
Trenton, NJ 08608

Re: ECRA Case No. 86009
Hexcel Corporation, Lodi, New Jersey
Sampling Plan Addendum

Dear Mr. Nalbone:

During our meeting on May 20, 1987 at the Fine Organics Corporation facility in Lodi, New Jersey we discussed the results of recent chemical analyses of environmental samples collected within the industrial sewer system and adjoining buildings. The purpose of this sampling was to further define the extent and nature of contamination by oil and PCBs in the industrial sewer system, within the pit in building no. 1 and within the boiler room. The results of these chemical analyses indicate that oil contaminated with PCBs is present within the industrial sewer system, within the pit in building no. 1 and within the pit in the boiler room. Floor scraping samples and wood chip samples within the boiler room also indicated PCB contamination. The results of the chemical analyses of these environmental samples are summarized in Table 1 and the laboratory report for these analyses are attached for your information.

Prior dye testing of the industrial sewer system has indicated that under surcharging conditions in the sewer system, wastewater will flow upstream from manhole no. M4 to manhole no. M8, at which point the industrial sewer is interconnected with a storm drain system. The other point of possible interconnection of the industrial sewer and storm drain system (between the catch basin in the rear yard and manhole M2) is closed.

As a result of these very recent findings we are proposing additional on site sampling and chemical analysis in the vicinity of the boiler room and building no. 1. The proposed additional sampling includes monitoring well construction, ground water sampling and soil borings. This Sampling Plan Addendum defines the scope of this additional work.

The Flour Mill, 1000 Potomac St., N.W.
Washington, D.C. 20007 • (202) 337-7444

Proposed Additional Sampling:

In addition to the proposed 14 Areas of Environmental Concern (AEC), the boiler room shall be considered as AEC 15. Physical evidence and prior chemical analyses suggest that PCB contaminated oil may be present beneath the boiler room floor and within the backfill along the common wall between the boiler room and building no. 1. The additional sampling proposed herein is to examine the nature and extent, if any, of contamination beneath the boiler room.

The proposed sampling of AEC 15 consists of; three soil borings (nos. 1501-1503) within the boiler room, and two soil borings (1504 and 1505) outside the boiler room along Molnar Road. In addition, a monitoring well (MW16) will be constructed to the rear (west) of the pit in building no. 1. This well will be constructed at the location of soil boring 1301, which was proposed in our earlier Sampling Plan.

Soil boring no. 1504 is at the location of the previously proposed boring no. 1201. With the designation of the boiler room as an AEC (no. 15), this boring is being renumbered for consistency.

Also, proposed samples nos. 1202-1206 within building no. 1 (AEC no. 12) are being renumbered as 1201-1205 for consistency. These proposed changes are reflected in Table 2 and Figure 1.

All soil borings will extend to the depth of the pit in building no. 1, approximately 15 feet below grade. The monitoring well MW16 will be screened in the water table above the first confining unit. All soil and ground water samples shall be analyzed for Total Petroleum Hydrocarbons (TPHC), Polychlorinated Biphenyls (PCB), and Volatile Organic Compounds (VOC). Table 2 list the proposed additional sampling, sample location, number and depth of samples and chemical analysis to be performed.

Methodology for Construction of Borings

Soil borings nos. 1501-1505 will be drilled with a tripod rig with continuous split spoon samples. A temporary casing will be installed during drilling to ensure no contamination is transported through any impermeable layer that might be encountered. Following completion, these borings will be sealed with neat cement in accordance with NJDEP regulations.

On June 17, 1987, I discussed the construction of the proposed boring nos. 1501-1505 with Mr. Jeff Fehr of the NJ Geologic Survey, who is the staff geologist on this case. Based on that discussion it is my understanding that Mr. Fehr is in agreement with the general methods proposed for construction of these borings. Mr. Fehr further requested that if oil is encountered during the

construction of these borings then at least one boring should be completed with a piezometer to monitor the thickness of the oil layer. With the proposed tripod drilling technique, which is the only practical technique to use within the boiler room due to low overhead clearance, it is not possible to drill a sufficiently large diameter hole to install a normal 4 inch monitoring well. Therefore it was agreed that a 1Ö-2 inch diameter PVC casing and screen would be installed to monitor any oil layer, if appropriate.

All drill cuttings and decontamination fluids from this additional sampling will be collected and stored in sealed drums on site. Disposal in the appropriate method will be based on waste classification tests.

All sampling will follow the procedures listed in ENVIRON's Field Manual previously submitted with the Proposed Sampling Plan.

If you have any comments or questions regarding this proposed addendum to the Sampling Plan, please call.

Very truly yours,

Arthur Bozza/RLP

Arthur Bozza
Staff Scientist

Robert L Powell

Robert L. Powell, Ph.D., P.E.
Project Manager

RLP:slh
1662H

cc: William Nosil, HEXCEL
Gary Straub, FOC
Ed Hogan, Esq.

TABLE 1

Summary of Environmental

Samples Collected April 14, 1987

Sample No.	Matrix	Location	PCB[1/] (mg/kg)	TPHC (mg/kg)
536A-MH01-FP01	oil	manhole M1	240[2/]	-
536A-MH01-FP02	oil	manhole M1	936[2/]	-
536A-MH03-SS01	sediment	manhole M3	150	299430
536A-MH04-SS01	sediment	manhole M4	240	300050
536A-MH08-SS01	sediment	manhole M8	10	17267
536A-MH08-SW01	water	manhole M8	ND	-
536A-CB08-FP01	oil	catch basin in rear yard on sewer system	498	-
536A-BD01-FP01	oil	pit in building no. 1	8630	-
536A-BR01-OIL1	floor scraping	boiler room, around hot oil system	5500	-
536A-BR02-OIL1	oil	boiler room, drip pan under hot oil system	1250	-
536A-BR03-OIL1	oil	boiler room, pit under boiler	1280	-
536A-BR04-OIL1	oil	boiler room, bucket under valve	ND	-
536A-BR05-OIL1	wood chips	boiler room, elevated wood decking	4100	-

1/ All PCB analyses reported as Aroclor 1248

2/ Sample no. MH01-FP01 and MH01-FP02 are split samples of floating oil

TABLE 2

ADDITIONAL PROPOSED SAMPLING LOCATIONS IN AREAS OF ENVIRONMENTAL CONCERN

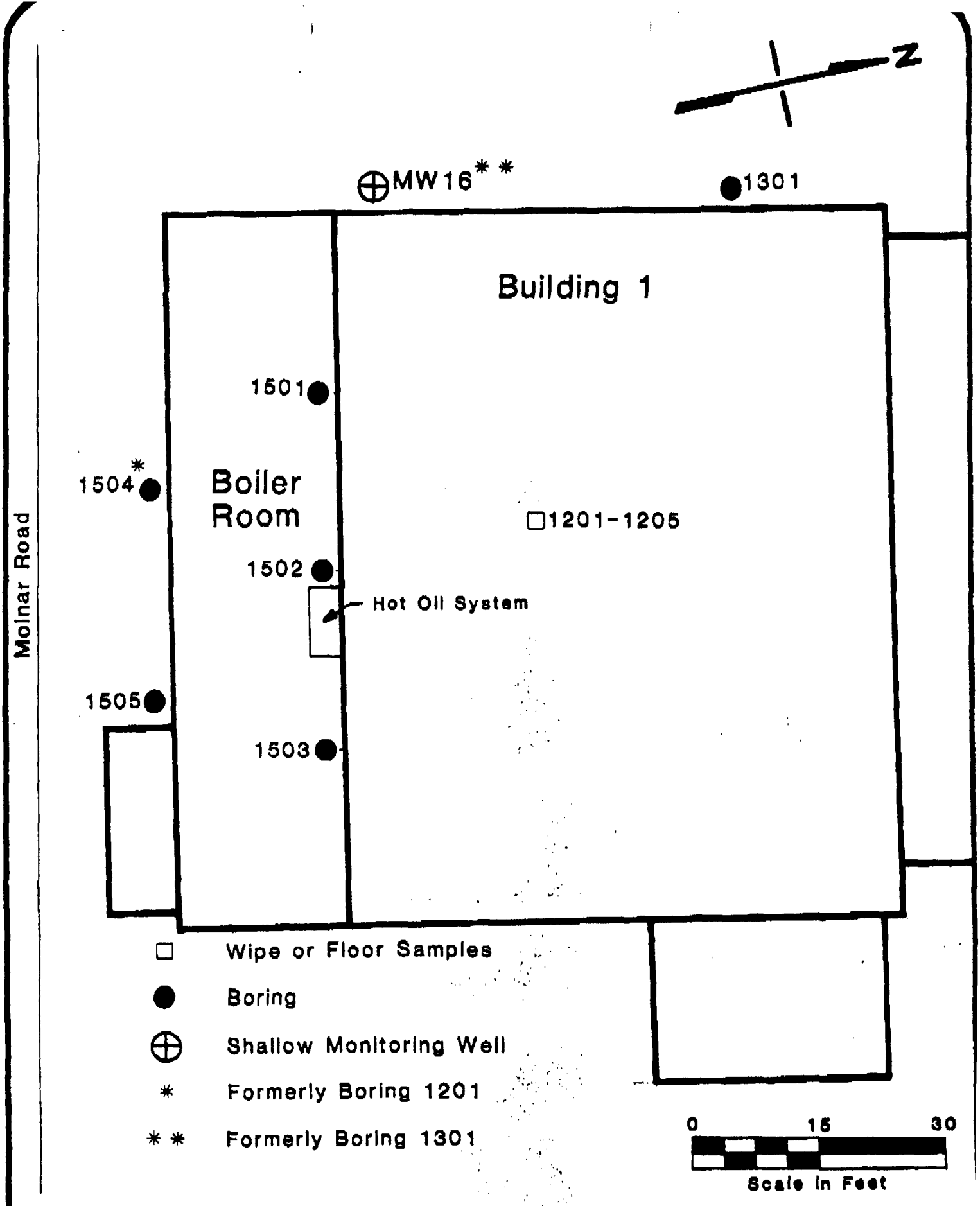
AEC[1]	Sampling Location[2]	Number and Type of Samples per location	Analysis[3]
12	1201-1205	Wipe or floor samples in pit	PCB
13	1301[4]	Power Auger Boring 3 soil samples • soil surface (0-2') • water table • top of confining strata	TPHC, PCB, VOC+15
	MW16	Monitoring Well 3 soil samples: • soil surface (0-2') • water table • top of confining strata	TPHC, PCB VOC+15
15	1501, 1502, 1503 1504, 1505	Tripod boring 3 soil samples: • water table • top of confining strata • visibly contaminated soil or (13-15')	TPHC, PCB, VOC+15

1 Area of Environmental Concern.

2 Sampling locations are depicted in Figure 1.

3 TPHC: Total Petroleum Hydrocarbons - Water samples will be analyzed for TPHCs by EPA method 418.1, and soil samples by EPA Method 418.1 following Soxhlet etraction.
VOC: Volatile Organic Compounds - Water samples will be analyzed for VOCs by EPA Method 624, and soil samples by field GC and EPA Method SW846:8240 (selected samples).
PCB: Polychlorinated Biphenyls - Water samples will be analyzed for PCBs by EPA Method 608, and soil samples by EPA Method SW846:8080.

1651H



ENVIRON
Counsel in Health and Environmental Science

FIGURE 1
PROPOSED ADDITIONAL SAMPLING
886100012

CENTURY
LABORATORIES, INC.
P.O. Box 248/1501 Grandview Avenue/MidAtlantic Park, Thorofare, NJ 08086
Phone: (609) 848-3939 NJ 800-222-0589

REPORT #: F0935
DATE: 5/4/87

CLIENT ENVIRON CORPORATION
210 Carnegie Center
Suite 201
Princeton, New Jersey 08540

SUBJECT One (1) sample submitted by the client on April 15, 1987 and identified as: Hexcel 536A, Chain of Custody # 536A-MH01-FP01.

AUTHORIZATION Arthur Bozza

PURPOSE Chemical Analysis

PROCEDURE Samples were analyzed in accordance with procedures presented in the following:

1. "The Determination of Polychlorinated Biphenyls in Transformer Fluid and Waste Oils", U.S. Environmental Protection Agency, EMSC, Cincinnati Ohio, September 1982 (EPA-600/4-81-045).

CENTURY LABORATORIES, INC.

Rodney T. Miller

Rodney T. Miller

jn

886100013

CENTURY LABORATORIES, INC.

Report #: F0935

Client: Environ Corporation

May 4, 1987

LABORATORY ANALYSIS - PCB's (AROCLORS)

Parameter	Results (ug/kg)
Aroclor 1016	70,000 U
Aroclor 1221	70,000 U
Aroclor 1232	70,000 U
Aroclor 1242	240,000
Aroclor 1248	70,000 U
Aroclor 1254	70,000 U
Aorclor 1260	70,000 U
Aroclor 1268	70,000 U

DEFINITIONS:

Value	If the result is a value greater than or equal to the detection limit, report the value.
U	Compound was analyzed for but not detected. The number is the minimum attainable detection limit for the sample.

ENVIRON

ENVIRON Corporation
Counsel in Health and Environmental Science

Sheet 1 of 1

CHAIN OF CUSTODY RECORD

Project Hexcel Job # 536A

Chain of Custody No.	Analysis	Sampled Date	Sampled Time	Sample Type	No. of Containers
536A-MH01-FP01	Priority Pollutant PCBs	4/14	10:30	Oil	1-250 ml

Analyses Required:

Comments:

Relinquished by:	Received by:	Date:	Time:
Arthur Boggs	Cathy Castle	4/15/87	12:40
		4/15/87	3:00 Pm

886100015

210 Carnegie Center, Suite 201
Princeton, New Jersey 08540 · (609) 452-9000

NOTICE ABOUT OVERSIZED MAP

THIS MAP IS AN OVERSIZED DOCUMENT. IT IS AVAILABLE FOR REVIEW AT THE U.S. EPA SUPERFUND RECORDS CENTER, 290 BROADWAY, 18TH FLOOR, NEW YORK, NY 10007
PHONE: (212) 637-4308.

DRAINAGE SYSTEM

PLATE 2

PLAN

886100016